

March 28, 2013

James Gonzales
ARCADIS U.S., Inc.
320 Commerce, Suite 200
Irvine, CA 92602

Dear Mr. Gonzales,

The letter is in response to your email dated March 21.

Section referring to report number P1103662:

The first four items seem to reference the validation of the laboratory report by either an internal ARCADIS party or 3rd party validator.

The fifth item listed, Section V. Continuing Calibration and Section VI. Internal Standards:
Please identify the criteria used to evaluate the data. I have included the QC table for TO-15 with this correspondence.

The sixth item listed, Section VI. Internal Standards: The area and retention time quality control data could not be located in the laboratory package (Appendix B). Please identify location. I have included the IS/RT summary sheets with this correspondence.

Section referring to report number P1200485:

The first two times seem to reference the validation of the laboratory report by either an internal ARCADIS party or 3rd party validator.

The 3rd item listed, Section IV, Initial Calibration: The relative standard deviation values could not be located in the laboratory package (Appendix B). Please identify the location. The ICAL summary with %RSDs is located in the ICAL section of the PDF.

The fourth item seems to reference the validation of the laboratory report by either an internal ARCADIS party or 3rd party validator.

The fifth item listed, Section V. Continuing Calibration and Section VI. Internal Standards:
Please identify the criteria used to evaluate the data. I have included the QC table for TO-15 with this correspondence.

The sixth item listed, Section VI. Internal Standards: The area and retention time quality control data could not be located in the laboratory package (Appendix B). Please identify location. I have included the IS/RT summary sheets with this correspondence.

Sincerely,



By Kate Aguilera at 5:13 pm, Mar 28, 2013

Kate Aguilera.

Project Manager

ALS Environmental – SIMI VALLEY, CALIFORNIA

| Summary of Calibration and Internal Quality Control Procedures for U.S. EPA Method TO-15 | | | |
|---|--|---|--|
| Quality Control Check | Minimum Frequency | Acceptance Criteria | Corrective Action |
| BFB Tuning Verification | Once every 24-hours or analytical batch | Ion abundance criteria as described in Table 3 of Method TO-15 | 1) Repeat BFB analysis 2) Retune instrument |
| Initial Calibration (ICAL) – minimum of five levels | Initially or if continuing calibration no longer meets criteria | 1) <30% RSD with 2 exceptions up to 40% [AFCEE: only \leq 30% RSD] 2) Area response at each calibration level within 40% of IS mean area response over the ICAL range. 3) Retention time for each IS within 20s of the mean retention time over the ICAL range. | 1) May repeat 1 point (if 5 levels) or 2 points (if 6 levels) 2) Inspect the system for problems and perform required maintenance 3) Repeat initial calibration Problem must be corrected. Samples may not be analyzed until there is a valid ICAL. |
| Initial Calibration Verification (ICV) | Following every ICAL | Percent difference of +/-30% | Correct problem and verify second source standard. Rerun second source verification. If that fails, correct problem and repeat initial calibration. Problem must be corrected. Samples may not be analyzed until there is a valid ICV. |
| Continuing Calibration Verification (CCV) | Once every 24 hours, if an ICAL has not been performed (within the last 24 hours). | Percent difference of +/-30% <u>Note:</u> If CCV is biased high and analyte is ND (not detected) results are acceptable. It will be noted in case narrative | 1) Reanalyze CCV 2) Identify and correct problem; re-analyze or if necessary qualify the data. 3) Repeat initial calibration if CCV corrective action is unsuccessful. |
| Internal Standards (IS) | All samples, duplicates, blanks and standards | 1) RT must be <20 sec from most recent valid calibration (ICAL midpoint or CCV) 2) Area response +/-40% of IS area response of most recent valid calibration (ICAL midpoint or CCV) | 1) Identify and correct the problem 2) Reanalyze the sample unless obvious matrix interference exists. 3) Problem persists, qualify data. |
| Surrogate Standards | All samples, duplicates, blanks and standards | 70-130% recovery [AFCEE: 60-140%] | 1) Identify and correct the problem 2) Reanalyze the sample unless obvious matrix interference exists 3) Problem persists, qualify data. |
| Laboratory Method Blank (MB) | Once every analytical batch of 20 or fewer samples | No analyte detected equal to or above the method reporting limit (MRL) [DoD: No analytes $>$ ½ MRL; common lab contaminants none detected $>$ MRL] | 1) Reanalyze blank 2) Identify and correct problem 3) Reanalyze blank and affected samples 4) Qualify data |

ALS Environmental – SIMI VALLEY, CALIFORNIA

| Summary of Calibration and Internal Quality Control Procedures for U.S. EPA Method TO-15 | | | |
|---|--|---|--|
| Quality Control Check | Minimum Frequency | Acceptance Criteria | Corrective Action |
| Laboratory Control Sample (LCS) | Once every analytical batch of 20 or fewer samples | Percent recovery (%R) within laboratory generated limits [AFCEE, AZ: 70-130% recovery] | 1) Reanalyze 2) Identify and correct the problem 3) Qualify data *DoD projects require corrective action for all exceedances. |
| Laboratory Duplicate (LD) | Once every analytical batch of 20 or fewer samples | Relative percent difference (RPD) within +/-25% for positive hits | 1) Analyze third aliquot 2) Flag data if third aliquot unacceptable |
| Holding Time (HT) | N/A | SUMMA Canisters - 30 days [EPA Region 9 - 14 days] Tedlar Bags - 72 hours [not included in AFCEE Manual] | Contact client and qualify data |
| Method Reporting Limit (MRL) | DoD: Quarterly LOQ/MRL Verification Required | At or above the low standard of the current initial calibration AFCEE: Minimum 2x method detection limit | N/A |
| Method Detection Limit (MDL) with Limit of Detection Verification | Initially and once per 12 month period DoD: Quarterly LOD Verification Required | Limit of Detection Verification - Response with a minimum signal to noise ratio of 3:1 | N/A |
| Report results between MDL and MRL | N/A | Upon request [Required for AFCEE and DoD projects; verify with Client QAPP] | Qualify results as estimated |

AFCEE – Air Force Center for Environmental Excellence, Appendix C: QAPP, Final Version 4.0.02, May 2006.

DoD – Department of Defense Quality Systems Manual for Environmental Laboratories, Final Version 4.1, April 2009.

AZ – Requirements for State of Arizona compliance samples.

Summary complies with Method TO-15 and 2003 NELAC Standard.

COLUMBIA ANALYTICAL SERVICES, INC.

RESULTS OF ANALYSIS

Page 1 of 1

Client: ARCADIS U.S., Inc.
Client Project ID: Jones Chemical Torrance / CM010270

CAS Project ID: P1103662

Internal Standard Area and RT Summary

Test Code: EPA TO-15
Instrument ID: Tekmar AUTOCAN/Agilent 5973inert/6890N/MS8 Lab File ID: 10061101.D
Analyst: Elsa Moctezuma Date Analyzed: 10/6/11
Sampling Media: 6.0 L Summa Canister(s) Time Analyzed: 08:55
Test Notes:

| | IS1 (BCM) | | IS2 (DFB) | | IS3 (CBZ) | |
|-------------------------|-----------|-------|-----------|-------|-----------|-------|
| | AREA # | RT # | AREA # | RT # | AREA # | RT # |
| 24 Hour Standard | 316508 | 12.97 | 1422962 | 15.91 | 661365 | 21.70 |
| Upper Limit | 443111 | 13.30 | 1992147 | 16.24 | 925911 | 22.03 |
| Lower Limit | 189905 | 12.64 | 853777 | 15.58 | 396819 | 21.37 |

| Client Sample ID | | | | | | |
|------------------|--------------------|--------|-------|---------|-------|--------|
| 01 | Method Blank | 300777 | 12.97 | 1334047 | 15.91 | 635258 |
| 02 | Lab Control Sample | 302209 | 12.97 | 1332686 | 15.91 | 640876 |
| 03 | AUS-IA-1 | 287477 | 12.96 | 1295255 | 15.91 | 616855 |
| 04 | AUS-IA-2 | 284025 | 12.96 | 1271768 | 15.91 | 615903 |
| 05 | AUS-IA-3 | 281666 | 12.97 | 1275920 | 15.91 | 608327 |
| 06 | AUS-IA-4 | 290676 | 12.96 | 1309657 | 15.91 | 623402 |
| 07 | AUS-IA-5 | 286771 | 12.96 | 1290362 | 15.91 | 615766 |
| 08 | AUS-IA-6 | 286714 | 12.96 | 1297197 | 15.91 | 615430 |
| 09 | AUG-IA-AMB-1 | 311905 | 12.96 | 1397708 | 15.90 | 657428 |
| 10 | AUG-IA-AMB-2 | 304514 | 12.96 | 1367845 | 15.90 | 643759 |
| 11 | AUS-IA-DUP | 297415 | 12.96 | 1338324 | 15.90 | 632038 |
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IS1 (BCM) = Bromochloromethane

IS2 (DFB) = 1,4-Difluorobenzene

IS3 (CBZ) = Chlorobenzene-d5

AREA UPPER LIMIT = 140% of internal standard area

AREA LOWER LIMIT = 60% of internal standard area

RT UPPER LIMIT = 0.33 minutes of internal standard RT

RT LOWER LIMIT = 0.33 minutes of internal standard RT

Column used to flag values outside QC limits with an I.

I = Internal standard not within the specified limits.

Verified By: _____ Date: _____
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COLUMBIA ANALYTICAL SERVICES, INC.

RESULTS OF ANALYSIS

Page 1 of 1

Client: ARCADIS U.S., Inc.

Client Project ID: Jones Chemical Torrance / CM010270

CAS Project ID: P1103662

Internal Standard Area and RT Summary

Test Code: EPA TO-15 SIM

Instrument ID: Tekmar AUTOCAN/Agilent 5973N/HP6890A/MS7

Lab File ID: 10061104.D

Analyst: Karen Ryan

Date Analyzed: 10/6/11

Sampling Media: 6.0 L Summa Canister(s)

Time Analyzed: 07:58

Test Notes:

| | IS1 (BCM) | | IS2 (DFB) | | IS3 (CBZ) | |
|-------------------------|-----------|------|-----------|------|-----------|-------|
| | AREA # | RT # | AREA # | RT # | AREA # | RT # |
| 24 Hour Standard | 61147 | 7.53 | 280779 | 9.05 | 140173 | 13.05 |
| Upper Limit | 85606 | 7.86 | 393091 | 9.38 | 196242 | 13.38 |
| Lower Limit | 36688 | 7.20 | 168467 | 8.72 | 84104 | 12.72 |

Client Sample ID

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|----|--------------------|-------|------|--------|------|--------|-------|
| 01 | Method Blank | 58491 | 7.55 | 265288 | 9.06 | 129910 | 13.06 |
| 02 | Lab Control Sample | 60054 | 7.53 | 280270 | 9.05 | 133904 | 13.05 |
| 03 | AUS-IA-1 | 62200 | 7.53 | 296466 | 9.05 | 143304 | 13.05 |
| 04 | AUS-IA-2 | 63514 | 7.54 | 298015 | 9.05 | 149063 | 13.05 |
| 05 | AUS-IA-3 | 63744 | 7.53 | 298436 | 9.05 | 148944 | 13.05 |
| 06 | AUS-IA-4 | 62880 | 7.54 | 303517 | 9.05 | 148364 | 13.05 |
| 07 | AUS-IA-5 | 62968 | 7.54 | 298847 | 9.05 | 145248 | 13.05 |
| 08 | AUS-IA-6 | 63577 | 7.53 | 289932 | 9.04 | 147208 | 13.05 |
| 09 | AUG-IA-AMB-1 | 63239 | 7.53 | 298273 | 9.05 | 149457 | 13.05 |
| 10 | AUG-IA-AMB-2 | 63221 | 7.54 | 302884 | 9.05 | 148267 | 13.05 |
| 11 | AUS-IA-DUP | 63897 | 7.53 | 297342 | 9.05 | 149075 | 13.05 |
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COLUMBIA ANALYTICAL SERVICES, INC.

Now Part of the ALS Group

RESULTS OF ANALYSIS

Page 1 of 1

Client: ARCADIS U.S., Inc.

CAS Project ID: P1200485

Client Project ID: Jones Chemicals Indoor Air Sampling / CM010270.0016**Internal Standard Area and RT Summary**

Test Code: EPA TO-15

Instrument ID: Tekmar AUTOCAN/Agilent 5973inert/6890N/MS8

Lab File ID: 02131201.D

Analyst: Wida Ang

Date Analyzed: 2/13/12

Sampling Media: 6.0 L Summa Canister(s)

Time Analyzed: 04:30

Test Notes:

| | IS1 (BCM) | | IS2 (DFB) | | IS3 (CBZ) | |
|-------------------------|-----------|-------|-----------|-------|-----------|-------|
| | AREA # | RT # | AREA # | RT # | AREA # | RT # |
| 24 Hour Standard | 232676 | 12.96 | 1072545 | 15.90 | 543792 | 21.69 |
| Upper Limit | 325746 | 13.29 | 1501563 | 16.23 | 761309 | 22.02 |
| Lower Limit | 139606 | 12.63 | 643527 | 15.57 | 326275 | 21.36 |

Client Sample ID

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|----|--------------------|--------|-------|---------|-------|--------|-------|
| 01 | Method Blank | 223469 | 12.95 | 1051148 | 15.89 | 508963 | 21.69 |
| 02 | Lab Control Sample | 227577 | 12.96 | 1055118 | 15.90 | 513403 | 21.69 |
| 03 | AUS-IA-1 | 226576 | 12.95 | 1059724 | 15.89 | 520271 | 21.69 |
| 04 | AUS-IA-2 | 227191 | 12.95 | 1064553 | 15.89 | 523694 | 21.69 |
| 05 | AUS-IA-3 | 225832 | 12.95 | 1061475 | 15.89 | 517654 | 21.69 |
| 06 | AUS-IA-4 | 227488 | 12.95 | 1063014 | 15.89 | 520482 | 21.69 |
| 07 | AUS-IA-5 | 228396 | 12.95 | 1077525 | 15.89 | 523978 | 21.69 |
| 08 | AUS-IA-6 | 230491 | 12.95 | 1078807 | 15.89 | 523715 | 21.69 |
| 09 | AUG-IA-AMB-1 | 229673 | 12.95 | 1076488 | 15.89 | 525691 | 21.69 |
| 10 | AUG-IA-AMB-2 | 229095 | 12.95 | 1078060 | 15.89 | 522756 | 21.69 |
| 11 | AUS-IA-DUP | 230553 | 12.95 | 1083103 | 15.89 | 529044 | 21.69 |
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RESULTS OF ANALYSIS

Page 1 of 1

Client: ARCADIS U.S., Inc.**Client Project ID:** Jones Chemicals Indoor Air Sampling / CM010270.0016 CAS Project ID: P1200485**Internal Standard Area and RT Summary**

Test Code: EPA TO-15 SIM

Instrument ID: Tekmar AUTOCAN/Agilent 5973N/HP6890A/MS7

Lab File ID: 02151204.D

Analyst: Karen Ryan

Date Analyzed: 2/15/12

Sampling Media: 6.0 L Summa Canister(s)

Time Analyzed: 05:21

Test Notes:

| | IS1 (BCM) | | IS2 (DFB) | | IS3 (CBZ) | | | |
|-------------------------|-----------|---|-----------|---|-----------|---|-------|---|
| | AREA | # | RT | # | AREA | # | RT | # |
| 24 Hour Standard | 50699 | | 9.33 | | 242825 | | 10.67 | |
| Upper Limit | 70979 | | 9.66 | | 339955 | | 11.00 | |
| Lower Limit | 30419 | | 9.00 | | 145695 | | 10.34 | |
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Client Sample ID

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|----|--------------------------|-------|------|--------|-------|--------|-------|
| 01 | Method Blank | 49287 | 9.34 | 231499 | 10.67 | 120547 | 13.42 |
| 02 | Lab Control Sample | 51149 | 9.33 | 236798 | 10.67 | 122815 | 13.42 |
| 03 | AUS-IA-1 | 50571 | 9.34 | 241881 | 10.67 | 131379 | 13.42 |
| 04 | AUS-IA-2 | 49593 | 9.33 | 240821 | 10.67 | 132298 | 13.42 |
| 05 | AUS-IA-3 | 50717 | 9.34 | 237683 | 10.66 | 131001 | 13.42 |
| 06 | AUS-IA-4 | 51063 | 9.33 | 245668 | 10.67 | 134293 | 13.42 |
| 07 | AUS-IA-5 | 51222 | 9.34 | 241253 | 10.67 | 134004 | 13.42 |
| 08 | AUS-IA-5 (Lab Duplicate) | 51560 | 9.34 | 250006 | 10.67 | 137176 | 13.42 |
| 09 | AUS-IA-6 | 50312 | 9.34 | 241241 | 10.67 | 132057 | 13.42 |
| 10 | AUG-IA-AMB-1 | 50754 | 9.34 | 240404 | 10.67 | 133288 | 13.42 |
| 11 | AUG-IA-AMB-2 | 50298 | 9.33 | 244545 | 10.67 | 134534 | 13.42 |
| 12 | AUS-IA-DUP | 50934 | 9.34 | 243168 | 10.67 | 131354 | 13.42 |
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